

February 19, 2020

VIA CM/ECF

Hon. Sarah L. Cave, U.S.M.J.
Daniel Patrick Moynihan United States Courthouse
500 Peral Street, Courtroom 18A
New York, NY 10007

Re: *In re Keurig Green Mountain Single-Serve Coffee Antitrust Litig.*, MDL No. 2542; Request to File Under Seal

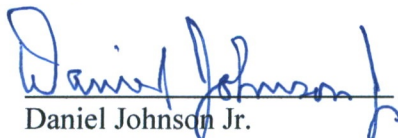
Dear Judge Cave:

We write on behalf of Plaintiff JBR, Inc. d/b/a Rogers Family Company (“JBR”) to request that the Court seal JBR’s Letter Motion Challenging Keurig’s Clawback pursuant to Rule I(F)(2) of Your Honor’s Individual Rules of Practice. Because the proposed letter motion and exhibits involve potentially confidential and sensitive matter, JBR proposes to file the materials with the Court via CM/ECF with restricted access pursuant to Rule I(A) and I(F)(2) of Your Honor’s Individual Rules of Practice. Additionally, JBR files herewith a redacted version consisting of one non-confidential exhibit to the motion.

JBR makes this sealing request to protect confidentiality interests asserted by Keurig. The proposed sealing concerns Keurig’s assertion of attorney-client privilege over one document, as well as deposition testimony from multiple Keurig and third-party witnesses and documents produced by Keurig and third parties that have been designated as confidential under the Stipulated Amended Protective Order (ECF No. 496).

JBR takes no position with respect to Keurig’s and third parties’ designations of the material. JBR’s proposed filing is narrowly tailored to protect the asserted confidentiality of the subject matter at issue, and it requests that the Court permit the filing of these documents under seal.

Respectfully submitted,


Daniel Johnson Jr.

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cc: Counsel for All Parties (via ECF)